

Exhibit 22

[REDACTED]

[REDACTED]

[REDACTED]

RE: FW: [External] RE: Skinner's Falls Bridge

Date: Mon, 24 Mar 2025 19:59:38 +0000

From: Hazelton, Susan <shazelton@pa.gov>

To: Art Suckewer <asuckewer@knite.com>

CC: Kurnath, Lindsey R <Lindsey_Kurnath@nps.gov>, benjamin.harvey@dot.gov <benjamin.harvey@dot.gov>, michelle.goddard@dot.gov <michelle.goddard@dot.gov>, Crobak, Jennifer (FHWA) <jennifer.crobak@dot.gov>, Gerling, Heather <hgerling@pa.gov>, Russell, Kara <krussell@pa.gov>, Lolli, Amy M <AMLLOLI@pa.gov>, Conway, Michael <michconway@pa.gov>, Ames, John A (Drew) <johname@pa.gov>, Thompson, Kristina L <krthompson@pa.gov>, Babinski, Gerard <gbabinski@pa.gov>, Kearns, Thomas J <Thomas_Kearns@nps.gov>, Lisa M. Brozey <Lisa.Brozey@aecom.com>, Radle, Daniel <Daniel.Radle@aecom.com>

Mr. Suckewer,

PennDOT has reviewed your proposal below and reviewed the attached rebuttal and has prepared a letter in response. Please see attached word document "SFB- Wrought Iron Bridge Works - Response 3.24.2025".

Thank you, Susan



Susan E Hazelton, P.E. | Assistant District Executive - Design

PA Department of Transportation | Engineering District 4-0
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From: Art Suckewer <asuckewer@knite.com>

Sent: Tuesday, February 25, 2025 11:07 PM

To: Hazelton, Susan <shazelton@pa.gov>

Cc: Kurnath, Lindsey R <Lindsey_Kurnath@nps.gov>, benjamin.harvey@dot.gov <benjamin.harvey@dot.gov>, michelle.goddard@dot.gov <michelle.goddard@dot.gov>, Crobak, Jennifer (FHWA) <jennifer.crobak@dot.gov>, Gerling, Heather <hgerling@pa.gov>, Russell, Kara <krussell@pa.gov>, Lolli, Amy M <AMLLOLI@pa.gov>, Conway, Michael <michconway@pa.gov>, Ames, John A (Drew) <johname@pa.gov>, Thompson, Kristina L <krthompson@pa.gov>, Babinski, Gerard <gbabinski@pa.gov>, Kearns, Thomas J <Thomas_Kearns@nps.gov>, Lisa M. Brozey <Lisa.Brozey@aecom.com>, Radle, Daniel <Daniel.Radle@aecom.com>

Subject: Re: FW: [External] RE: Skinner's Falls Bridge

Susan Hazelton,

Thank you for your response of Feb. 3. I have replied to your comments in the attached word document in [blue](#). I have also attached two images of the Rt-22 span between Easton and Phillipsburg being built in 1937 (opened 1938), the truss has a span of 540 feet and has multiple lanes. That bridge used falsework on the order you are proposing. Falsework of that magnitude is complete overkill of the lightweight, single lane, bridge with spans of half the length.

PennDOT is set up to efficiently replace old bridges with great new ones but, like most modern state DOTs, is not well equipped to design and oversee the restoration obsolete (historic truss) spans. If historic bridge preservation experts (a niche that is impractical to retain on staff) restored it to meet both AASHTO/engineering standards (except to the bridge's original design limitations), it will meet the need of the crossing, reduce the environmental disturbance that a removal/replacement would entail, could be done more cost effectively than the options presented (meeting the Secretary of Interior's standards without short cuts and exceeding engineering requirements and labor laws) and probably last longer than something modern.

There are ways of doing these sorts of rehabilitations (done regularly in IN and MI). Specifically, doing this type of work as design-build projects, rather than torturing PennDOT with figuring out design solutions. To your organization, these are obsolete white elephants and headaches; while to specialists these obsolete bridges are easy to maintain highly functional gems. After 30 years of expending resources on observing analyzing, seeking consultation and mitigation without significant actual maintenance, PennDOT is trying to get rid of the problem by getting rid of the bridge.

I humbly request you reexamine what I have proposed and assist in finding another path. I can put you in touch with engineers (now retired) from other PennDOT districts that can speak to our knowledge of these structures and their experience with our work.

Please let me know if you are open to this.

Sincerely,

Art S.

On 2/3/2025 3:23 PM, Hazelton, Susan wrote:

Art Suckewer,
Thank you for emailing Amy Lolli regarding Skinners Falls Bridge. PennDOT has reviewed your proposal below and reviewed the attached project information and has prepared a letter in response. Please see attached word document "SFB-Wrought Ironworks Response".
Susan

From: Art Suckewer <asuckewer@knite.com>
Sent: Thursday, January 16, 2025 5:09 PM
To: Lolli, Amy M <AMLOLLI@pa.gov>; Goddard, Michelle (FHWA) <michelle.goddard@dot.gov>
Cc: Gerling, Heather <hgerling@pa.gov>; Russell, Kara <krussell@pa.gov>
Subject: Re: [External] RE: Skinner's Falls Bridge

Amy,

Thank you for taking my call. I didn't get Mike's email, so please forward this to him as well.

Two bridge projects that we did in PA are of relevance to the emergency situation at Skinner's Falls Bridge: Mead Avenue Bridge and Red Mill Road Bridge.

The removal of the Mead Avenue Bridge Whipple truss superstructure within the easement, but without the use of cranes and no water incursion represents a project of similar scale (shorter but of similar mass and a more complex nature): <https://www.loc.gov/resource/hhh.pa0377.photos>
<https://tile.loc.gov/storage-services/master/pnp/habshaer/pa/pa0300/pa0377/data/pa0377data.pdf>

Red Mill Road Bridge is more relevant. Of note, it was also an emergency removal due to a failing abutment. The scale was much smaller but the abutment situation was a bit more severe.

I have attached our plan as submitted by Aaron Craig and signed off by the County (owner) for addressing the Red Mill Road Bridge. I have also attached the concluding report for the project.

Regarding Skinner's Falls:

To address the emergency resulting from the failing abutment:

My suggestion is to create/erect a falsework of similar design to that used on Red Mill Road Bridge under the 1/4 - 1/3 of the NYS span which is over land above the low water mark, adjacent the abutment. The falsework would support the superstructure at the floorbeams and incorporate a hydraulic jacking feature at each attachment point. The falsework itself would rest on specialized bearing plates that do not require footings or significant ground disturbance. These features have significantly expedited permitting on previous projects.

The bearing plates are of sufficient size to reduce the ground load sufficiently to not disturb possible ecological/archeological features below the ground surface and provide sufficient friction to minimize lateral motion once under load.

The hydraulic jacks will allow adjustment and a gradual, minimal stress, unloading of the truss end bearings to safely facilitate abutment work.

Our existing falsework components are available and can be quickly modified to accommodate the specifics of this bridge.

The support of the falsework will also provide adequate safety to deploy netting under the remainder bridge while the abutment is being restored.

Flood protection would be provided by a gabion based deflection/mass system placed upstream (on-shore). Preferably, the falsework would be tied to it via cable.

Responsibility transfer:

One of the dilemmas being faced by PENNDOT is that this is more of a historic preservation project than an infrastructure improvement. However, as this is part of an interstate agreement, its removal creates its own headaches. By transferring the long term responsibility for the bridge to the NPS (I believe they oversee the Roebling Aqueduct / bridge) or another local organization in a carefully structured agreement, the bridge's care would better align responsibility and purpose for what is a historic artifact. Also, the transfer of ownership/responsibility/liability may allow funds from a different source to be used to fund the restoration.

Restoration:

Assuming there is buy-in, the falsework approach could be implemented to safely and (relatively) cost effectively restore the entire substructure and superstructure.

Using the partial falsework approach, the bridge could be fully restored with a small crew over several years; minimizing risk, cost, environmental and cultural impacts. Techniques similar to those used in Indiana and Michigan would be implemented in order to fully restore the bridge in a manner that will meet both AASHTO and Secretary of the Interior standards. For the restoration, I would recommend the participation of Jim Barker PE (or his associates) as he is the technical editor of the NPS historic bridge restoration guide.

I hope this will be considered by the relevant parties.

Sincerely,

Art S.

On 1/16/2025 11:29 AM, Lolli, Amy M wrote:

Thanks for your interest Art. I will forward your message to the rest of the department and get a response back to y

Amy M. Lolli, EIT | Assistant Liaison Engineer
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55 Keystone Industrial Park | Dunmore PA 18512
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-----Original Message-----

From: Goddard, Michelle (FHWA) <michelle.goddard@dot.gov>
Sent: Thursday, January 16, 2025 11:20 AM
To: Art Suckewer <asuckewer@knite.com>
Cc: Gerling, Heather <hgerling@pa.gov>; Lolli, Amy M <AMLLOLLI@pa.gov>
Subject: [External] RE: Skinner's Falls Bridge

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Hi Art,

Thank you for reaching out about the Skinners Falls bridge. I believe the best point of contacts to discuss your idea

Thank you,
Michelle

Michelle Goddard, AICP (she/her/hers)
Team Leader - Environment
Federal Highway Administration, Pennsylvania Division
(P) 717-221-3785 | (E) Michelle.Goddard@dot.gov

-----Original Message-----

From: Art Suckewer <asuckewer@knite.com>
Sent: Wednesday, January 15, 2025 10:50 AM
To: Goddard, Michelle (FHWA) <michelle.goddard@dot.gov>
Subject: Skinner's Falls Bridge

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Dear Ms. Goddard,

I received your contact from Kara Russell of PENNDOT.

I have been involved in rescuing several historic bridges in PA, including a similar (but smaller) bridge at the beh

I believe we can use derivatives of these methods to quickly and economically resolve the immediate emergency and saf

Are you available for a phone call to determine if a last minute save is still an option?

Sincerely,

Art S.

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Art Suckewer
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OS-2 (2-22)



March 24, 2025

Wayne County
Damascus, PA
State Route 1002, Skinners Falls Bridge

Art Suckewer
Wrought Iron Bridge Works
asuckewer@knite.com

Dear Mr. Suckewer:

Thank you for the additional information on your proposal regarding the Skinners Falls Bridge.

Public safety is a priority for the Federal Highway Administration, PennDOT and NYSDOT. Your proposal does not adequately address safety for workers and recreational users of the river.

Regarding the emergency created by the failed condition of the Skinners Falls Bridge, two inspections of the bridge were completed in the last six months, with the most recent completed in January 2025. This inspection confirmed the results of the October 2024 inspection and also found evidence of continued deterioration. The January 2025 inspection identified an increase in movement at the far-left truss bearing and associated movement at the far left wingwall below the far-left truss bearing. These noted increases indicate that the far abutment and far left bearing areas are actively moving between inspections. Based on the evidence of frozen expansion bearings, it is reasonable to conclude that the expansion and contraction forces encountered by the truss are being translated directly into the abutment without mitigation or reduction in forces from the bearings. The expansion and contraction forces are unanticipated forces of which stone masonry abutments are not designed to handle. These conditions create an emergency that must be addressed in a way that is safe for workers and must be addressed before the start of the recreational season for the safety of the river users. The purpose of the project is to address the failed condition of the bridge and prevent the uncontrolled collapse of the structure. As stated in Governor Shapiro's Emergency Declaration, the immediate removal of the structure, while attempting to minimize impacts to resources is vital to the security, well-being and health of the citizens of the Commonwealth of Pennsylvania.

The timeframe outlined in your approach does not address the immediacy of the safety concerns and risks associated with the documented condition of the bridge. You propose restoration over several season/years. That would endanger recreational river users for an extended timeframe. Additionally, it does not address the condition of the superstructure and the falling debris. Netting cannot be safely installed, under the

Art Suckewer – Skinners Falls Bridge

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bridge. The netting would need to be applied from the top of the bridge, at deck level. Because of the failed condition, the bridge is not safe, even for workers on foot to access and install the netting.

As previously mentioned, the work to address the safety concerns needs to be completed before the start of the recreational river season.

Thank you again for sharing your thoughts regarding Skinners Falls Bridge. Should you require any additional information, please contact me at 570.963.3015 or at shazelton@pa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan E. Hazelton". The signature is fluid and cursive, with the first name "Susan" and last name "Hazelton" clearly distinguishable.

Susan E Hazelton, P.E.

Assistant District Executive - Design